Application No.: 10/647,475 Docket No.: 8733.311.10-US

Amdt. dated September 20, 2004 (September 18th = Saturday)

Reply to Office Action dated June 18, 2004

REMARKS

At the outset, Applicant thanks the Examiner for the thorough review and consideration of the pending application. The Office Action dated June 18, 2004 has been received and its contents carefully reviewed.

Claims 13, 14, 16, 18, 20, and 23 are hereby amended; claims 15, 17, 19, 21, 22, 26, and 27 are hereby canceled; and claims 28-32 are hereby added. Accordingly, claims 13, 14, 16, 18, 20, 23-25, and 28-32 are currently pending. Reexamination and reconsideration of the pending claims is respectfully requested.

In Office Action, the Examiner rejected claims 13-27 under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicant regards as the invention; and rejected claims 13-27 under 35 U.S.C. § 103(a) as being unpatentable over any one of Moinpour et al. (any one of U.S. Patent Nos. 5,861,066, 5,868,857, or 5,901,399) and Culkins et al. (U.S. Patent No. 5,937,469) in view of Kubota et al. (U.S. Patent No. 6,059,891) and Maekawa et al. (U.S. Patent No. 5,868,866).

The rejection of claims 13-27 under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicant regards as the invention, is traversed and reconsideration is respectfully requested.

Rejecting claims 13-27 for indefiniteness, the Examiner states "it is not clear what manipulative steps are required." Applicant hereby amends claims 13 and 23 to more clearly describe the manipulative steps in compliance with the requirements of 35 U.S.C. § 112, second paragraph. Consequently, withdrawal of the present rejection under 35 U.S.C. § 112, second paragraph, is respectfully requested.

The rejection of claims 13-27 under 35 U.S.C. § 103(a) as being unpatentable over any one of Moinpour et al. and Culkins et al. in view of Kubota et al. and Maekawa et al. is traversed and reconsideration is respectfully requested.

Claim 13 is patentable over either <u>Moinpour et al.</u> or <u>Culkins et al.</u> in view of <u>Kubota et al.</u> and <u>Maekawa et al.</u> in that claim 13 recites a combination of elements including, for

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example, "cleaning a side surface of the substrate by jetting deionized water onto the side surface of the substrate and by brushing the side surface of the substrate with a brush that extends partially along the side surface of the substrate." Neither Moinpour et al., Culkins et al., Kubota et al., nor Maekawa et al., singly or in combination, teach or suggest at least this feature of the claimed invention. Accordingly, Applicants respectfully submit that claims 14, 16, 18, and 20, which depend from claim 13, are also patentable over either Moinpour et al. or Culkins et al. in view of Kubota et al. and Maekawa et al.

Claim 23 is patentable over either Moinpour et al. or Culkins et al. in view of Kubota et al. and Maekawa et al. in that claim 23 recites a combination of elements including, for example, "removing foreign substances on a side surface of the substrate using a side-cleaning module having a water jet device jetting deionized water onto the side surface of the substrate and including cleaning brushes that extend partially along the side surface of the substrate."

Neither Moinpour et al., Culkins et al., Kubota et al., nor Maekawa et al., singly or in combination, teach or suggest at least this feature of the claimed invention. Accordingly, Applicants respectfully submit that claims 24 and 25, which depend from claim 23, are also patentable over either Moinpour et al. or Culkins et al. in view of Kubota et al. and Maekawa et al.

Further, Applicant respectfully submits that claim 28 is patentable over the cited references in that claim 28 recites a combination of elements including, for example, "A method of cleaning a substrate having an upper surface and a lower surface separated by at least two opposing side surfaces, the method comprising: brushing at least two opposing side surfaces; cleaning at least one of the upper and lower surfaces; and spraying water onto the at least two brushed side surfaces." None of the cited references, either singly or in combination, teach or suggest at least this feature of the claimed invention. Accordingly, Applicants respectfully submit that claims 29-32, which depend from claim 28, are also patentable over the cited references.

Applicant believes the foregoing amendments place the application in condition for allowance and early, favorable action is respectfully solicited.

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If for any reason the Examiner finds the application other than in condition for allowance, the Examiner is requested to call the undersigned attorney at (202) 496-7500 to discuss the steps necessary for placing the application in condition for allowance. All correspondence should continue to be sent to the below-listed address.

If these papers are not considered timely filed by the Patent and Trademark Office, then a petition is hereby made under 37 C.F.R. §1.136, and any additional fees required under 37 C.F.R. §1.136 for any necessary extension of time, or any other fees required to complete the filing of this response, may be charged to Deposit Account No. 50-0911. Please credit any overpayment to deposit Account No. 50-0911. A duplicate copy of this sheet is enclosed.

Dated: September 20, 2004

Respectfully submitted,

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